



October 28, 2021

VIA ECF

Honorable Judge Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Tenzer-Fuchs v. Bloom Nutrition, LLC; No; 2:21-cv-2487-GRB

Dear Honorable Judge Brown,

The undersigned represents Plaintiff Michelle Tenzer-Fuchs (hereinafter “Plaintiff”) in the above referenced matter. This Letter is submitted in response to the Court’s September 28, 2021 Order directing Plaintiff to file a status report by October 28, 2021.

Plaintiff served Defendant Bloom Nutrition, LLC (hereinafter “Defendant”) on June 25, 2021 through its process server. Defendant’s responsive pleading deadline was set to July 16, 2021.

Since Defendant’s responsive pleading deadline, Plaintiff had made a number of good-faith attempts to reach the Defendant and notify them of the lawsuit filed in this Court. Specifically, a message with the default notification was sent to Defendant via its website.

On September 30, 2021, Counsel for Defendant, Elizabeth Ragavanis, with the law firm of Odell Girton Siegel, LLC had reached out to schedule a phone call with the undersigned regarding this matter. The parties had met and conferred and have engaged in continuing settlement discussions. The undersigned respectfully requests an additional thirty (30) days to attempt to discuss resolution with Defendant prior to proceeding accordingly.

The undersigned thanks this Court for its time and attention to this matter.

Thank you.

Respectfully submitted,

/s/Jonathan Shalom

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